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Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

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Regulation 8(1)(k)**

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<u>December 2023</u>	<u>A</u>	<u>Final</u>	<u>For submission at Deadline 6</u>
<u>February 2024</u>	<u>B</u>	<u>Final</u>	<u>Updated for submission at Deadline 8. This SoCG reflects the latest position with Essex Police</u>

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1. Introduction

- 1.1.1 This document supports National Grid Electricity Transmission plc's (here on referred to as National Grid) application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex.
- 1.1.2 A Statement of Common Ground (SoCG) is a written statement produced as part of the application for development consent and is prepared jointly between the Applicant and another party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.3 The aim of a SoCG is to help the Examining Authority manage the examination phase of the application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during examination, and then updated as necessary or as requested during the examination phase.
- 1.1.4 This SoCG is between National Grid (the Applicant) and Essex Police relating to the application for development consent for the Bramford to Twinstead reinforcement ('the project'). This SoCG has been prepared in accordance with the guidance for the examination of applications for development consent for Nationally Significant Infrastructure Projects (NSIP) (Planning Act 2008) published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).
- 1.1.5 This SoCG has been prepared to identify matters between National Grid and Essex Police in respect to the Bramford to Twinstead reinforcement only. The SoCG will evolve as the application progresses through examination.

1.2 Description Of the Project

- 1.2.1 This document supports National Grid's application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex. This would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km. The project meets the threshold as a NSIP, as defined under Part 3 of the Planning Act 2008, hence National Grid requires a development consent order (DCO).
- 1.2.2 The reinforcement would comprise approximately 18km of overhead line (consisting of approximately 50 new pylons, and conductors) and 11km of underground cable system (with associated joint bays and above ground link pillars).
- 1.2.3 Four cable sealing end (CSE) compounds would be required to facilitate the transition between the overhead and underground cable technology. The CSE would be within a fenced compound, and contain electrical equipment, support structures, control building and a permanent access track.
- 1.2.4 Approximately 27km of existing overhead line and associated pylons would be removed as part of the proposals (25km of existing 132kV overhead line between Burstall Bridge and Twinstead Tee, and 2km of the existing 400kV overhead line to the south of Twinstead Tee). To facilitate the overhead line removal, a new grid supply point (GSP) substation is required at Butler's Wood, east of Wickham St Paul, in Essex. The GSP

substation would include associated works, including replacement pylons, a single circuit sealing end compound and underground cables to tie the substation into the existing 400kV and 132kV networks.

- 1.2.5 Some aspects of the project, such as the underground cable sections and the GSP substation, constitute 'associated development' under the Planning Act 2008.
- 1.2.6 Other ancillary activities would be required to facilitate construction and operation of the project, including (but not limited to):
- Modifications to, and realignment of sections of existing overhead lines, including pylons;
 - Temporary land to facilitate construction activities including temporary amendments to the public highway, public rights of way, working areas for construction equipment and machinery, site offices, welfare, storage and access;
 - Temporary infrastructure to facilitate construction activities such as amendments to the highway, pylons and overhead line diversions, scaffolding to safeguard existing crossings and watercourse crossings;
 - Diversion of third-party assets and land drainage from the construction and operational footprint; and
 - Land required for mitigation, compensation and enhancement of the environment as a result of the environmental assessment process, and National Grid's commitments to Biodiversity Net Gain.

1.3 This Statement of Common Ground

For the purpose of this SoCG, National Grid and Essex Police will jointly be referred to as the Parties'. When referencing Essex Police alone, they will be referred to as the Consultee'. This Statement of Common Ground is the final version, with all matters agreed. Therefore, no sections are included for matters under discussion or 'not agreed'.

- 1.3.1 This SoCG is structured as follows:
- Section 1 provides an introduction to this SoCG and a description of its purpose.
 - Section 2 states the role of the Consultee in the DCO application process and details engagement undertaken between the Parties.
 - Section 3 sets out matters agreed between the Parties.
 - Section 4 includes the signing off sheet.

2. Record of Engagement

2.1 Role of the Consultee in the Process

2.1.1 Essex Police is a Statutory Consultee under the 2008 Planning Act paragraph 42 1) a) as the relevant police force for the county of Essex for the control and enforcement of law, crime prevention and highways management. Essex Police is part of the national police force under the Home Office remit.

2.2 Summary of Pre-Application Discussions

2.2.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the application.

Table 2.1 – Pre-Application Discussions

Date	Topic	Discussion points
2021	Meeting Abnormal Indivisible Loads	Informal meeting to discuss Abnormal Indivisible Loads and provide a project update.

2.3 Summary of Post-Submission Discussions

2.3.1 Table 2.2 summarises the consultation and engagement that has taken place between the Parties post submission of the application.

Table 2.2 – Post-submission discussions

Date	Topic	Discussion Points
12/07/23	Representation by Essex Police (Essex Police) RR-033	Essex Police submitted a Relevant Representation into Examination to 'seek to secure appropriate mitigation and management measures, either via requirements of the DCO or Statement of Common Ground, to address the likely impacts arising from the scheme on its operations, service capacity, infrastructure, and resources'.
25/09/23	Deadline 1- Applicants Comments on Relevant Representations	The Applicant commented on the Relevant Representations made by Essex Police [RR-033]. The response confirmed that Essex Police and the Applicant have held discussions regarding the potential for the project to impact on services provided by Essex Police. The Applicant will continue to liaise with Essex Police AIL vehicles regarding their route movements requirements.
31/10/2023	Essex Police response to ExQ1	Response to question MG 1.0.6 asked by ExA of Essex Police. Whilst Essex Police are responsible for policing in the County of Essex, we work closely with the neighbouring police force. Confirms initial contact was made by the Applicant in 2021 regarding AIL movements, but due to the early engagement no agreements were made. Request further conversations to discuss route and movements along with other aspects of road's policing. The following have not yet been addressed by the Applicant:

		<ul style="list-style-type: none"> • Communications and designing out crime. • Workforce, response plans and roads policing considerations • Construction traffic management plan points. <p>Contact has been made by the Applicant and request for SoCG made.</p>
02/11/2023	Meeting to discuss Relevant Representation and response to written questions	The need for a SoCG to address the Consultee's request. Consultee concerns included theft and safety and how to deal with protest. There was also a need to distinguish the project from the Norwich to Tilbury project: Liaison with Suffolk Police is needed by the Applicant and the Consultee.
09/01/2024	Meeting to discuss remaining points in the SoCG	Meeting to discuss changes to the documents submitted to address Essex Police comments and procedures necessary to agree disputes. Discuss next steps and follow up meeting.
19/01/2024	Email correspondence	Email correspondence where Essex Police confirmed a number of matters could be agreed. The SoCG was updated and returned for further discussion at a proposed meeting for 23/01/2024.
23/01/2024	Meeting to discuss remaining points in SoCG	Meeting to agree final points on the SoCG prior to submission at Deadline 8.

3. Matters Agreed

Table 3.1 – Matters agreed

SoCG ID	Matter	Agreed Position	Date Agreed
Community Liaison			
3.1.1	Scheme Development – Communication	<p>A clear contact strategy and community liaison route for matters relating to the project has been set out within Section 7.4 of the Construction Traffic Management Plan (CTMP) (document 7.6 (C)) and 3.4 of the Construction Environmental Management Plan (CEMP), (document 7.5 (C)), this is further confirmed in good practice measure GG25 in Appendix A Code of Construction Practice (CoCP) (document 7.5.1 (B)).</p> <p>The CEMP provides the provision for a community relations team to be appointed to provide dedicated community relations and external communication support during construction. Where required the relations team will liaise with Essex Police.</p> <p>The name and contact details for the project will be displayed at the entrance to the main site compound. This will include an emergency telephone number. In addition, details of the works, including contact details, will be provided to the relevant community groups, such as the local parish councils and landowners before work commences.</p> <p>A free telephone project helpline and project website will be maintained and managed by the Applicants community relations team. The project helpline and website information will be visible on boards placed in appropriate locations where they will be visible to the public.</p>	19/01/24
Crime and Security			
3.2.1	Scheme Development- Designing Out Crime and Security- operation	<p>Para 2.3.5 of the ES Appendix 4.1 Good Design (document 6.3.4.1) provides information regarding security fencing that will be used at the Grid Supply Point Substation and the Cable Sealing End Compounds. Essex Police have reviewed the information provided in the Good Design (document 6.3.4.1) and are content that security will be a factor at the detailed design stage of the project.</p> <p>Essex Police acknowledge the information relating to security fencing and are satisfied this matter can be agreed on the basis the fencing provision is risk commensurate and to industry approved standards. Essex Police Designing out Crime team are happy to liaise at the detailed design stage should this be required.</p>	18/12/23
3.2.2	Scheme Development- Designing Out Crime and Security- construction	<p>Information relating to training and awareness is set out in Section 3.3 of the CEMP (document 7.5 (D)) and good practice measure GG05 in Appendix A CoCP (document 7.5.1 (C)) of the CEMP. Vigilance to identifying security concerns and risks has been added to the list of toolbox talks that will be given to construction staff.</p>	19/01/24

		<p>Crime risk is a high priority for the Applicant, design and security of the site compounds will be subject to site-specific risk assessments and appropriate measures will be put in place using applicable security standards wherever possible to mitigate the risk of criminal activity. Section 5.5 of the CTMP (document 7.6 (D)) provides some information on security at the proposed access points. Essex police will be consulted on crime prevention measures at the detailed design stage of the project.</p>	
3.2.3	Incident Response	<p>Section 3.5 in the CEMP (document 7.5 (D)) addresses Emergency Procedures and good practice measure GG22 in Appendix A CoCP (document 7.5.1 (C)) of the CEMP states <i>'An Emergency Action Plan will be developed for the construction phase which will outline procedures to be implemented in case of unplanned events, including but not limited to site flooding and pollution incidents.'</i></p> <p>The Applicant has added a commitment to its CEMP (document 7.5 (D)) to work with emergency services during construction planning and incorporate into the Emergency Action Plan an incident response process for protest related activity and a clear escalation process for dispute resolution matters.</p> <p>The name and contact details of a key National Grid point of contact (at the appropriate grade) will be made available to Essex Police for the construction phase of the Bramford to Twinstead Reinforcement.</p>	19/01/24
Construction Traffic Management			
3.3.1	Construction Traffic Management Plan- Wheel Washing and Road Sweeping	<p>GG17 of the CoCP (document 7.5.1(C)) states that wheel washing or other wheel cleaning systems will be provided at each main compound access point on to the highway where a need has been identified through the design process. Road sweepers will be deployed on public roads where necessary to prevent excessive dust or mud deposits.</p> <p>Essex Police acknowledge good practice measure GG17 of the CoCP (document 7.5.1(C)) regarding wheel washing and road sweeping and are satisfied this matter can be agreed on the basis that they receive confirmation of these locations at the appropriate time alongside an appropriate point of contact to ensure a process is in place to address any issues identified should this process fail.</p> <p>The Applicant has updated the CTMP Document 7.6 (D) at deadline 8 to say that a plan showing the location of wheel washing facilities will be provided to the relevant police services.. This commitment has also been added to good practice measure GG17 in the CoCP (document 7.5.1(C)) at deadline 8.</p>	18/12/23
3.3.2	Construction Traffic Management Plan- AILs	<p>At Deadline 6 the Applicant provided further information on the management of AILs including:</p> <ul style="list-style-type: none"> • Document 8.8.11: Reports on Abnormal Indivisible Load Access for Cable Drums, Transformers and Shunt Reactors: this contains three reports of assessments carried out to review AIL routes. • Document 7.6 (D) CTMP: updated with minor amendments made in response to comments including: splitting the plans in Appendix A to make the AIL routing clearer (by splitting AIL routes and construction 	23/01/24

routes into separate plans); adding detail on the monitoring and enforcement of construction traffic and AIL routes; and adding references to the AIL reports discussed above.

The Parties agree that further information on timing of deliveries and routing will be provided through the Special Types General Orders (STGO) process at the appropriate time once information is available. Given that the highway network condition, maintenance works and resource availability of escorts can change between now and deliveries, the STGO process should be undertaken closer in time to the deliveries rather than during the Examination.

The Parties agree that there is a need for early discussions between the Applicant and the Abnormal Loads Officer at the relevant police services to ensure AIL deliveries are planned efficiently and safely. The Applicant will hold discussions with the Abnormal Loads Officer in advance of a STGO application to discuss:

- final AIL routing from the point of origin to the point where materials are required;
- planning for appropriate rest points for AIL vehicles taking account of the speed of AIL vehicles, the size of vehicles and regulations that limit driving time (noting that the National Highways plan of AIL holding bays is not up to date);
- approximate dates for deliveries to ensure availability of escorts for the length of the route given the number of infrastructure projects in the area (e.g. Sizewell); and
- consideration of handover points where deliveries cross County borders given that in some areas there are limited opportunities for vehicles to stop safely.

3.3.4	Construction Traffic Management Plan-Incident Planning (holding large vehicles at their origin, within the site or at appropriate locations on the highway network)	<p>Essex Police acknowledge the information provided in section 5.4 of the CTMP (document 7.6(D)) regarding construction contingency routes.</p> <p>Essex Police requested further reassurance that there would be clear lines of communication between the Applicant and Essex Police in the event of an incident on the highway network.</p> <p>Paragraph 5.4.8 to 5.4.10 of the CTMP (document 7.6(D)) sets out the process for contingency routes where there are exceptional circumstances on the road network. This states that in such exceptional circumstances that the contractor will liaise directly with relevant highway authorities to establish where predefined construction routes may be temporarily disrupted by other works or events and seek to establish alternative routes.</p> <p>The Parties agree that should an incident occur on the local highway network then Police would notify the community liaison officer as discussed in point 3.1.1. Contact details for the community liaison officer will be provided to the police prior to construction in line with the contact strategy. Should the incident require it, the Applicant would liaise with drivers of construction vehicles and staff crew vans as far as possible to notify them of the incident and inform them of any diversionary routes.</p>	23/01/24
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		The Applicant would similarly inform the Police of any closures or diversions that occur unexpectedly as a result of the construction works.	
3.3.5	Construction Traffic Management Plan- Road Safety	<p>Essex Police acknowledge the information provided within section 5.8 of the CTMP (document 7.6(D)) regarding traffic management and good practice measure AS03.</p> <p>Essex Police note that road closures and diversions can influence policing response times, particularly given the rural nature of the road network, the limited alternative routes, and the fact that response vehicles will often may be travelling from some distance to attend an incident. Get to this area as the Police don't have a local base. Advance notice of the diversions and closures can <u>is essential to aid planning and minimise impacts to response times.</u></p> <p>The Construction routes are available in Appendix A of the CTMP (document 7.6(D)).</p> <p>CTMP (document 7.6(D)) in Section 5.8 sets out the traffic management proposed by the Applicant. Paragraph 5.8.1 states that '<i>Traffic management will be used where required to maintain public or workforce safety. This will include during construction and removal of access points, when erecting or dismantling scaffolding and where the underground cables cross the LRN. The anticipated roads that will require traffic management measures are shown on the Traffic Regulation Order Plans (application document 2.6) and the Access, Rights of Way and Public Rights of Navigation Plans (document 2.7).</i>' The traffic management will be proportionate to the size of the road and duration and volume of traffic.</p> <p>Paragraph 5.8.3 states that '<i>roads will only be closed where this is required for safe working. Road proposed for closing are shown on the Access, Rights of Way and Public Rights of Navigation Plans (document 2.7) along with the proposed diversion routes.</i></p> <p>The Parties agree that the Applicant will notify the Police in advance of road closures and diversions by sharing information submitted with the Permit Applications with the Police when they are submitted to the Local Highways Authority <u>for approval This will minimise to assist in minimising</u> any impact on response times.</p>	23/01/24

6.4. Approvals

Signed	John Bevan
On Behalf of	NGET
Name	John Bevan
Position	Senior Project Manager
Date	<u>09/02/2024</u>
Signed	Lisa Cooke
On Behalf of	The Consultee
Name	Chief Inspector Lisa Cooke
Position	Essex Police: Strategic Planning Senior Responsible Officer
Date	18/12/2023 01/02/2024

Reference List

Department for Communities and Local Government (2015) *Planning Act 2008: Guidance for the examination of applications for development consent*. March 2015 (Department for Communities and Local Government, 2015)

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